

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

SHANNON PEREZ, et al.,

Plaintiffs,

- and -

EDDIE BERNICE JOHNSON, et al.,

- and -

TEXAS STATE CONFERENCE OF
NAACP BRANCHES, et al.,

Plaintiff Intervenors,

v.

RICK PERRY, et al.,

Defendants,

MEXICAN AMERICAN LEGISLATIVE
CAUCUS, TEXAS HOUSE OF
REPRESENTATIVES (MALC),

Plaintiffs,

- and -

HONORABLE HENRY CUELLAR, et al.,

Plaintiff Intervenors,

v.

STATE OF TEXAS, et al.,

Defendants,

CIVIL ACTION NO.
SA-11-CA-360-OLG-JES-XR
[Lead case]

CIVIL ACTION NO.
SA-11-CA-361-OLG-JES-XR
[Consolidated case]

TEXAS LATINO REDISTRICTING TASK
FORCE, et al.,

Plaintiffs,

v.

RICK PERRY, et al.,

Defendants,

MARAGARITA V. QUESADA, et al.,

Plaintiffs,

v.

RICK PERRY, et al.,

Defendants,

JOHN T. MORRIS,

Plaintiff,

v.

STATE OF TEXAS, et al.,

Defendants,

CIVIL ACTION NO.
SA-11-CA-490-OLG-JES-XR
[Consolidated case]

CIVIL ACTION NO.
SA-11-CA-592-OLG-JES-XR
[Consolidated case]

CIVIL ACTION NO.
SA-11-CA-615-OLG-JES-XR
[Consolidated case]

EDDIE RODRIGUEZ, et al.,)	CIVIL ACTION NO.
)	SA-11-CA-635-OLG-JES-XR
)	[Consolidated case]
<i>Plaintiffs,</i>)	
)	
v.)	
)	
STATE OF TEXAS, et al.,)	
)	
<i>Defendants.</i>)	

**LATINO TASK FORCE PLAINTIFFS' EXPERT WITNESS DESIGNATIONS,
DISCLOSURE OF POTENTIAL FACT WITNESSES, AND PROPOSED EXHIBIT LIST**

Pursuant to this Court's Amended Scheduling Order, the plaintiffs in the case originally styled *Texas Latino Redistricting Task Force, et al. v. Rick Perry*, 5:11-cv-490 ("Latino Task Force Plaintiffs") hereby designate potential expert and lay witnesses, disclose expert reports,¹ and present their Exhibit List.

I. EXPERT WITNESS DESIGNATIONS

The Latino Task Force Plaintiffs, by and through their counsel MALDEF, have retained Dr. Susan Gonzalez Baker, Dr. Richard Engstrom, Dr. Henry Flores, and Dr. Andres Tijerina to provide expert witness reports and testimony. The experts' curriculum vitae and reports are filed as attachments to this disclosure.

¹ The Court has ordered the parties to "FILE the materials required by FED.R.CIV.P. 26(a)(2)(B), which will include a copy of each expert's written report *and the data upon which the expert relies in forming his opinions.*" Dkt. 27 (emphasis added). The Latino Task Force Plaintiffs assume that the citations in the experts' reports, as well as the tables supporting the reports, suffice to fulfill their duty to provide the data upon which the experts rely in forming their opinions. The Latino Task Force Plaintiffs advise that the data on which their experts rely are voluminous and can be provided on one or more DVDs, but not by way of the ECF system, and maintain that they are willing and able to provide the data on a DVD if requested by the Court.

As disclosed to Defendants on July 13, 2011, **Dr. Gonzalez Baker** is expected to testify regarding Latino demographic patterns and the present day effects of discrimination on Latinos in the State of Texas.

As disclosed to Defendants on July 13, 2011, **Dr. Engstrom** is expected to testify regarding racially polarized voting in Texas.

As disclosed to Defendants on July 27, 2011, **Dr. Flores** is expected to testify regarding racial discrimination in the enactment of the challenged redistricting plans.

As disclosed to Defendants on July 13, 2011, **Dr. Tijerina** is expected to testify regarding the history of racial discrimination against Latinos in the state of Texas.

II. POTENTIAL LAY WITNESS DESIGNATIONS

The Latino Task Force Plaintiffs may call the following fact witnesses: Joey Cardenas, Alex Jimenez, Jose Olivares, Tomacita Olivares, Paul Castillo, Michael Seifert, Robert C. Flores, Larry Perez, Ramon Garcia, Israel Rocha, John Castillo, Texas Representative Roberto Alonzo, Texas Representative Rafael Anchia, Texas Representative Mike Villarreal, Hector M. Flores, Sergio L. De Leon, Senator Gonzalo Barrientos, Joe Bernal, Andy Hernandez, Carlos Rivera, Florinda P. Chavez, Armando Cortez, Cesar Eduardo Yevenes, Gregorio Benito Palomino, Renato De Los Santos, Gilberto Torres, Socorro Ramos, Sergio Coronado, and Cynthia Valadez.

On July 13 and 27, 2011, the Latino Task Force Plaintiffs disclosed to Defendants the general area of potential testimony, as well as the addresses and phone numbers of the witnesses listed above.

The Latino Task Force Plaintiffs designate by reference any persons listed as potential witnesses by the Perez Plaintiffs or Plaintiff Intervenors, MALC, LULAC, the Quesada Plaintiffs, John T. Morris, or the Rodriguez Plaintiffs.

III. EXHIBIT LIST

The Latino Task Force Plaintiffs submit their Exhibit List as an Exhibit hereto.

Dated: August 8, 2011

Respectfully submitted,

/s/ Nina Perales

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REBECCA ORTIZ

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 8th day of August, 2011. The undersigned counsel hereby certifies that she caused a true and correct copy

of the above and foregoing to be mailed to the persons listed below by the close of the next business day.

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